

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

BIG LOTS, INC., *et al.*,

Debtors.¹

Chapter 11

Case No. 24-11967 (JKS)

(Jointly Administered)

NOTICE OF ENTRY OF APPEARANCE AND DEMAND FOR NOTICES AND PAPERS

PLEASE TAKE NOTICE that Chipman Brown Cicero & Cole, LLP, hereby enters its appearance as counsel for and on behalf of D.H. Pace Company, Inc. (“**D.H. Pace**”), pursuant to section 1109(b) of 11 U.S.C. §§ 101-1532 (as amended and applicable hereto, the “**Bankruptcy Code**”) and Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”) in the above-captioned bankruptcy cases (the “**Cases**”). Undersigned counsel further requests, pursuant to Bankruptcy Rules 2002, 3017, and 9007 and sections 342 and 1109(b) of the Bankruptcy Code, that copies of all notices and pleadings given or filed in the Cases be given and served upon the undersigned as follows:

Mark L. Desgrosseilliers, Esquire
Chipman Brown Cicero & Cole, LLP
Hercules Plaza
1313 North Market Street, Suite 5400
Wilmington, DE 19801
Telephone: (302) 295-0191
Email: desgross@chipmanbrown.com

PLEASE TAKE FURTHER NOTICE that this request for notice and service includes copies

¹ The Debtors in these chapter 11 cases, along with the last four digits of their respective tax identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); Big Lots Stores - CSR, LLC (6182); BLBO Tenant, LLC (0552); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277).

of all papers, including, but not limited to, reports, pleadings, motions, applications or petitions, schedules, plans, disclosure statements, and answering or reply papers filed in this case or any related adversary proceeding. Such service shall be by mailing one copy of each paper, unless otherwise directed by the Court, to the parties listed above.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance nor any former or later pleading, claim, or suit shall waive (1) the right of D.H. Pace to have final orders in non-core matters entered only after *de novo* review by the United States District Court for the District of Delaware (the “**District Court**”), (2) the right of D.H. Pace to trial by jury in any proceeding so triable in the Cases or any case, controversy, or proceeding related to the Cases, (3) the right of D.H. Pace to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (4) any other rights, claims, actions, defenses, set-offs, or recoupments to which D.H. Pace is or may be entitled under agreements in law or in equity.

Dated: January 3, 2025

CHIPMAN BROWN CICERO & COLE, LLP

/s/ Mark L. Desgrosseilliers

Mark L. Desgrosseilliers (No. 4083)
Hercules Plaza
1313 North Market Street, Suite 5400
Wilmington, Delaware 19801
Telephone: (302) 295-0191
Email: desgross@chipmanbrown.com

Counsel for D.H. Pace Company, Inc.